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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

DISABILITY RIGHTS OREGON,
METROPOLITAN PUBLIC DEFENDER
SERVICES, INC., and A.J. MADISON,

Plaintiffs,

v.

DAVID BADEN, in his official capacity as head
of the Oregon Health Authority, and DOLORES
MATTEUCCI, in her official capacity as
Superintendent of the Oregon State Hospital

Defendants,

and

LEGACY EMANUEL HOSPITAL &
HEALTH CENTER d/b/a UNITY CENTER
FOR BEHAVIORAL HEALTH LEGACY
HEALTH SYSTEM, PEACEHEALTH, and
PROVIDENCE HEALTH & SERVICES,

Intervenors.

v.

Defendants.

Case No. 3:02-cv-00339-MO (Lead Case)
Case No. 3:21-cv-01637-MO (Member Case)
Case No. 6:22-cv-01460-MO (Member Case)

UNOPPOSED MOTION TO EXTEND
THE APRIL 7 DEADLINE TO SUBMIT
PROPOSED AMENDED ORDER

JAROD BOWMAN and
JOSHAWN DOUGLAS- SIMPSON,

Plaintiffs,

v.

DOLORES MATTEUCCI, Superintendent of the
Oregon State Hospital, in her individual and
official capacity, DAVID BADEN, Director of
the Oregon Health Authority, in his official
capacity, and PATRICK ALLEN in his
individual capacity,

Defendants,

and

LEGACY EMANUEL HOSPITAL & HEALTH
CENTER d/b/a UNITY CENTER FOR
BEHAVIORAL HEALTH LEGACY HEALTH
SYSTEM, PEACEHEALTH, and
PROVIDENCE HEALTH & SERVICES,

Intervenors.

LEGACY EMANUEL HOSPITAL & HEALTH
CENTER d/b/a UNITY CENTER FOR
BEHAVIORAL HEALTH; LEGACY HEALTH
SYSTEM; PEACEHEALTH; and
PROVIDENCE HEALTH & SERVICES
OREGON,

Plaintiffs,

v.

DAVID BADEN, in his official capacity as
Director of Oregon Health Authority,

Defendant.

3:21-CV-01637-MO (Member Case)

6:22-cv-01460-MO (Member Case)

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 7-1(a)(1)(A), counsel for Marion County and
Plaintiffs conferred regarding this motion. All counsel support this motion.

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PROPOSED AMENDED ORDER

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MOTION

On April 3, 2023, the Court heard argument on Plaintiff's Motion for Order Requiring Marion County Sheriff to Transport Patients, denied the motion, and per minute order Dkt. 368 ordered "all interested parties" including Marion County and Plaintiffs to provide proposed amendatory language regarding who is obligated to perform what actions after patients are released from OSH, and under what authority, to the Court's September 1, 2022, order by April 7, 2023. The Court further ordered all interested parties to provide briefing on two issues raised at the hearing, as detailed in the Court's Minute Order, by April 25, 2023.

All Parties and Amicus are currently in mediation. The third mediation session is scheduled for April 11, 2023, with the potential of another session following that one. Marion County and Plaintiffs have discussed proposed amendatory language pursuant to the April 3, 2023, order and believe the upcoming mediation session on April 11, 2023, will help them to reach consensus on the proposed language.

Marion County and Plaintiff's therefore respectfully ask this Court to extend the deadline for submitted proposed amendatory language to April 25, 2023, to allow them time to further mediate and reach consensus on language to propose to this Court.

Marion County will submit a form of proposed order.

Dated this 5th day of April, 2023

Respectfully submitted,

/s/Jane E. Vetto
Jane E. Vetto OSB # 914564
Marion County Counsel
Attorney for Defendants Marion County